

FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

EARL PARRIS, JR., individually, and)	
on behalf of a Class of persons similarly)	
situated,)	
)	
<i>Plaintiff,</i>)	
)	
CITY OF SUMMERVILLE,)	
GEORGIA,)	Civil Action No.
<i>Intervenor-Plaintiff,</i>)	4:21-cv-40-TWT
)	
v.)	
)	
3M COMPANY, et al.,)	
)	
<i>Defendants.</i>)	

PROPOSED SCHEDULING ORDER

	<u>EVENT</u>	<u>DEADLINE</u>
1.	Initial Disclosures	May 23, 2022.
2.	Beginning of Fact Discovery Period (including discovery regarding class certification)	May 23, 2022.
3.	Amended Pleadings to Add Parties as of Right	Any amended pleadings to add additional parties as of right to be filed within 180 days of entry of this Order.
4.	Parties to confer and submit Proposed Briefing Order (or competing proposals if no agreement) regarding the number of briefs, page limitations, and related issues for Class Certification, Summary Judgment, and Daubert Motions	120 days after fact discovery begins.



5.	Fact Discovery Closes	360 days after fact discovery begins.
6.	Plaintiffs' Expert Disclosures (Class Certification and Merits) ¹	60 days after fact discovery closes.
7	Plaintiff's Class Certification Motion	30 days after Plaintiffs' Expert Disclosures
8.	Depositions of Plaintiffs' Experts	30 days after Plaintiff's Class Certification Motion
9.	Defendants' Expert Disclosures (Class Certification and Merits)	Within 30 days of deadline for Depositions of Plaintiffs' Experts
10.	Defendants' Response to Plaintiff's Class Certification Motion	30 days after Defendants' Expert Disclosures
11.	Depositions of Defendants' Experts	30 days after Defendants' Response to Plaintiff's Class Certification Motion
12.	Rebuttal Experts	Within 30 days of the date for completion of Depositions of Defendants' Experts, any party may serve Rebuttal Expert Reports to address expert opinions disclosed for the first time after that party's

¹ For all deadlines contained herein, "Plaintiff" shall pertain to Plaintiff Earl Parris, Jr. and Intervenor-Plaintiff City of Summerville, Georgia, except those deadlines pertaining to class certification, which shall pertain only to Plaintiff Earl Parris, Jr.

		Expert Reports were served. Depositions of Rebuttal Experts, if any, to be completed within 30 days of service of Rebuttal Expert Reports.
13.	Plaintiff's Reply in Support of Class Certification Motion	Within 30 days of deadline for Depositions of Rebuttal Experts
14.	Motions for Summary Judgment/Daubert Motions	120 days after Plaintiff's Reply in Support of Class Certification
15.	Responses to Motions for Summary Judgment/Daubert Motions	Within 30 days of Motions for Summary Judgment/Daubert Motions
16.	Replies in Support of Motions of Summary Judgment/Daubert Motions	Within 30 days of Responses to Motions for Summary Judgment/Daubert Motions
17.	Trial Date	